

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

MALIBU MEDIA, LLC,)	
)	
Plaintiff,)	Civil Action Case No. 5:19-CV-00834-DAE
)	
v.)	
)	
JOHN DOE,)	
)	
Defendant.)	
_____)	

**JOINT MOTION FOR EXTENSION OF SUMMARY JUDGMENT RESPONSE
DEADLINES**

Plaintiff Malibu Media, LLC and Defendant John Doe request that the Court grant an extension of 10 days to file responses to the pending cross-motions for summary judgment filed December 21, 2020 [Dkt 59-60].

Good cause exists to grant the parties' request for the following reasons:

1. On December 21, 2020, the parties filed cross-motions for summary judgment.
2. Specifically, Plaintiff filed for summary judgment on Defendant's several affirmative defenses and three counterclaims [Dkt. 60]. And Defendant filed for summary judgment on Plaintiff's claim for copyright infringement and Defendant's corresponding counterclaim for a declaratory judgment of non-infringement [Dkt. 59].
3. Because of the several issues raised in the parties' motions, the workloads of both parties' counsel, and the additional personal demands on the parties and their counsel given the holidays, the parties ask the Court to grant a reasonable 10-day extension for each party to file a response to the other party's summary judgment motion. This will move the response deadline from January 4, 2021 to January 14, 2021.

4. This extension will not impact any pending deadline. And the parties make this request not for delay, but rather so that justice may be done.

For these reasons, the parties respectfully request the Court grant the requested extension. A proposed order is attached.

Dated: December 28, 2020

Respectfully Submitted,

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By: /s/ Paul S. Beik

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CERTIFICATE OF SERVICE

Under the Federal Rules of Procedure. I certify that on December 28, 2020, a copy of the foregoing was served on all parties by the Court's ECF filing system.

/s/ JT Morris
JT Morris